

As the WRC has adopted a no-code provision for HF operations and many nations are changing their rules to remove the Morse Code requirements for Amateur licensing, the petitioner asks that the Commission remove the Element 1 requirement for license classes above Technician. I disagree and ask that the Commission reject this petition.

I believe The Commission, as I pointed out in my affirmative comments to RM-10781, has "an obligation in its regulating duties as to the broader implications of its rules and how they effect the development of this Service". The Amateur Service is first People. It is a valuable national resource, not commerce, and deserves a delicate touch. Therefore, I wish to address my objection to RM-10782 in both technical and philosophical grounds.

In a broader sense, I believe our nation has lost many challenges that would make us a better people. We now fear sending humans to space because the real danger of this work has been brought home to us. We fear collaboration which will involve a flexibility of our positions, and instead replace it with confrontation and war. We weaken standards that have brought challenge and when met - accomplishment - simply because they are difficult. The famous words of President Kennedy have been twisted - We make it easy, because it is hard. I encourage the Commission to deeply consider the broader implications of removing this simple requirement and reject RM-10782.

On more technical grounds, International Morse, and I suppose we can consider the "International" in this term weakened by WRC, is a difficult skill for some to master, but certainly not an impossibility. Its value as a reliable method of communication is continually demonstrated in the Amateur and Commercial service, and although satellite communications has supplanted the Radio Operator requirement for commercial shipping, I know of at least one Captain who keeps a hand key and HF gear available, nonetheless. He told me during a public tour, "If my ship is going down, I want the assurance of communication with a human, not a machine". In other words, what happens when the satellites, mobile phone towers and land lines fail?

The Morse skill is maintained by Amateur Radio operators through contesting, "rag chewing", and the active maintenance of the American Radio Relay League's National Traffic System, in which I participate regularly. We have already seen how Amateur Radio supplanted the domestic telephone and mobile phone services during the recent Northeast power failure. Further erosion of domestic communications systems will likely press all modes of communications into service, including the use of Morse code. Having operators with Morse knowledge will strengthen, not weaken, the Amateur service and assure the continuation of an old, but potentially valuable resource.

RM-10782 should be rejected and I believe the Commission would do well to consider RM-10781 which does not eliminate the Morse requirement, but instead grants HF privileges to Technician Class licensees. The licensing upgrade incentive will remain, a "practice area" for development of Morse skills will be created, and this valuable challenge will remain a component of the Amateur Service.

The Amateur community often refers to "The Radio Arts". Technical skill, operating proficiency, diligence in maintaining a legally operating station, are not the only practices of Amateur Radio. Removing the Morse requirement will weaken the "Art", and in the long term, further erode the Heart of the Amateur Service.

Respectfully,

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